

Pursuant to Local Rule 3-4(a)(1)  
please see the last page for a  
listing of parties represented

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

STEVEN AMES BROWN,

Plaintiff,

v.

ANDREW B. STROUD, an individual  
and *dba* STROUD PRODUCTIONS AND  
ENTERPRISES, INC.

Defendant.

CIVIL NO. 08-02348 JSW (MEJ)

METHVEN & ASSOCIATES  
PROFESSIONAL CORPORATION,

Plaintiff.

v.

SCARLETT PARADISE-STROUD, *et. al.*,

Defendants

CIVIL NO. 13-1079 JSW (MEJ)

STIPULATION & ~~[PROPOSED]~~  
ORDER DISMISSING CLAIMS  
AND DEEMING ALL PENDING  
MOTIONS WITHDRAWN

Pursuant to the settlement agreement among the parties dated December 11, 2015, as amended, Steven Ames Brown ("Brown"), San Pasqual Fiduciary Trust Company as administrator of the Estate of Nina Simone ("Simone Estate") and Sony Music Entertainment ("Sony Music") hereby stipulate as follows:

Brown, the Simone Estate and Sony Music hereby dismiss with prejudice all claims each of them has made against the other in these proceedings, including but not limited to *Brown v. Stroud*, Documents 82, 670, 679 and 688, and *Methven v. Paradise-Stroud*, Documents 192, 201 and 210, including the sealed versions thereof, with each party bearing its own costs and attorney's fees.

These dismissals do not affect any claims against any other party, or the judgment and amendment thereof entered in *Brown v. Stroud*, Documents 609 and 661; nor does it affect any rights or obligations under the settlement agreement dated December 11, 2015, as amended, including but not limited to the right to enforce the agreement. The parties hereby withdraw all pending motions.

Dated: February 24, 2016

Respectfully submitted,

/s/

STEVEN AMES BROWN,  
Plaintiff in *pro se*

/s/

DOROTHY M. WEBER,  
Shukat, Arrow, Hafer, Weber & Herbsman,  
LLP,  
Attorneys for the Estate of Nina Simone

/s/

JEFFREY G. KNOWLES,  
COBLENTZ, PATCH, DUFFY & BASS, LLP,  
Attorneys for Reply Counterdefendant Sony  
Music Entertainment erroneously sued as  
Sony Music Holdings, Inc.

**STEVEN AMES BROWN**

Entertainment Law 83363  
69 Grand View Avenue  
San Francisco, California 94114-2741  
415/647-7700 Tele  
415/285-3048 Fax  
[sabrown@entertainmentlaw.com](mailto:sabrown@entertainmentlaw.com)

**THERESE Y. CANNATA** SBN 88032

Cannata, Ching & O'Toole, LLP  
100 Pine Street  
San Francisco, California 94111  
415/409-8900 Tele  
415/409-8904 Fax  
[tcannata@ccolaw.com](mailto:tcannata@ccolaw.com)

Attorneys for Plaintiff Brown

**DOROTHY M. WEBER**, *pro hac vice*

Shukat, Arrow, Hafer, Weber &  
Herbsman, LLP  
111 West 57<sup>th</sup> Street, Suite 1120  
New York, New York 10019  
212/245-4580 Tele  
212/956-6471 Fax  
[dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)

Attorneys for Estate of Nina Simone

**JEFFREY G. KNOWLES, Esq.** (Bar No. 129754)

COBLENTZ, PATCH, DUFFY & BASS, LLP  
One Ferry Building, Suite 200  
23 San Francisco, CA 94111-4213  
415/391-4800 Tele  
415/989-1663 Fax  
[jdg@cpdb.com](mailto:jdg@cpdb.com)

Attorneys for Reply Counterdefendant Sony Music Entertainment,  
Erroneously sued as Sony Music Holdings, Inc.

~~[PROPOSED]~~ ORDER

It is so ordered. The Clerk shall close these cases.

Dated: February 25, 2016

  
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United States District Judge